Responses to Comments from CDPHE and EPA Draft Seep Collection and Treatment Proposed Action Memorandum Operable Unit No. 7

000066153

1. Comment

The seep water should be double contained from the time it leaves the sump pump. This would require the 2-inch piping which delivers the water up to the tanks to be double-walled rather than single walled.

Response

The design will have double-walled piping rather than the single-walled piping from the collection box to the tanks.

2. Comment

The high-level alarm/pump shutoff should be positioned so that it will activate when there is 2 feet of freeboard remaining in the tanks.

Response

The high-level alarm/pump shutoff is positioned with 1 to 1.5 feet of freeboard remaining in the tanks. This provides an additional volume of 1,000 gallons to 1,700 gallons.

3. Comment

Has spill/drip containment at the tanks been planned?

Response

The standard operating procedure for pumping and transporting the water will have specific directions to place an inflatable HDPE bath or container beneath the disconnect port to catch any drips. The tanks and all piping to the disconnect port are double-contained for spill control.

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4. **Comment**

Will the tanks be alternately emptied so that one can serve as contingency capacity? Will the two tanks be connected so that a full tank will overflow into the adjacent empty one?

Response

The tanks will be alternately emptied so that one can serve as contingency capacity. The two tanks are connected so that the full tank will overflow into the adjacent empty tank.

5. **Comment**

Will it be necessary to drain the pond as stated in the assumption at the end of Section 3.1? Section 3.3 states that "minimal dewatering will be required."

Response

It will not be necessary to drain the pond as stated in the assumptions at the end of Section 3.1. The pond will be dewatered only to the extent that it accommodates the construction activities. However, the pond will be completely dewatered prior to landfill closure. Pond dewatering is part of a separate action. The statement in Section 3.3 regarding minimal dewatering refers to dewatering included in this action.

6. **Comment**

Because the two tanks have a combined 4.5-day capacity, the 90-day storage limit for hazardous waste should not become a problem and the tanks will not need to be permitted. However, DOE should be attentive to the 90-day limit and all other RCRA requirements for 90-day hazardous waste storage units.

Response

DOE will be attentive to the 90-day limit and all other RCRA requirements for 90-day hazardous waste storage units.

7. **Comment**

The 5 cubic yards of excavated materials mentioned in Section 3.3 must be containerized, characterized, and disposed of in a manner which follows the protocol for investigation-derived waste.

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Response

DOE will follow the guidance from CDPHE and EPA received in August 15, and August 25, 1994, project meetings: "Soil excavated during construction of the leachate collection system will be placed in the landfill." The guidance indicated that movement of excavated soil within the IHSS would not constitute placement and trigger LDRs. DOE will also comply with all Rocky Flats procedures concerning waste characterization and disposal.

8. Comment

To simplify the determination of performance standards, particularly in light of ongoing discussions of ARARs, adjust the language in Section 3.1 to require that the collected seep water to be treated at the OU2 Treatment facility and assure that the facility maintains its effluent standards. Table 3-1 and reference to it can be removed to avoid any confusion.

Response

DOE will modify the language in Section 3.1 to simplify the discussion of ARARs. The statement will read to the effect that the collected seep water will be treated at the appropriate treatment facility to levels below the facility effluent standards. Table 3-1 will then be modified to include only constituent, average concentration, and maximum concentration and will be moved to Section 2.3 - Characteristics of the Seep at SW097.